

EXHIBIT B

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

In Re: Chapter 11)
LTL MANAGEMENT, LLC,) Case No. 21-30589
Debtor.) (MBK)

VIDEO RECORDED EXAMINATION OF
JAMES MURDICA

TAKEN ON

SUNDAY, APRIL 16, 2023

CERTIFIED STENOGRAPHER:

JESSIE WAACK, RDR, CRR, CCRR, NYRCR, NYACR,
CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958)
CCR-WA (No. 21007264), CSR-CA (No. 14420),
REALTIME SYSTEMS ADMINISTRATOR
JOB NO.: 893549

1 A. So when did -- 02:18:25

2 Q. When -- sorry? 02:18:26

3 A. I don't know what you're asking 02:18:27
4 me. Go ahead. 02:18:28

5 Q. So what I'm trying to figure out 02:18:29
6 is, I think you said -- and we'll get to 02:18:32
7 the data a little bit later, but I think 02:18:33
8 you said that the -- this -- this term 02:18:35
9 sheet was first provided to law firms 02:18:36
10 around late March or early April, I think 02:18:39
11 you said? 02:18:41

12 A. Yes. But, again, in the form 02:18:41
13 that it's in now, this chart, I believe, 02:18:44
14 was actually created by your clients. So I 02:18:47
15 want to be clear that in the form that it's 02:18:51
16 in now, that is correct. 02:18:53

17 But your clients have had or 02:18:55
18 created this, in part, years ago. 02:18:57

19 Q. Okay. And when -- when is the 02:19:00
20 first time you recall having shared the 02:19:03
21 substance of this chart with Mr. Watts? 02:19:05

22 A. I'm trying to remember when. 02:19:07
23 Probably sometime in 2022, maybe late 2021. 02:19:19
24 I really can't remember. 02:19:24

25 Q. And I'm just, for the record, 02:19:39

1 just gonna -- to note that I'm going to 02:19:40
2 move to strike the references to my clients 02:19:43
3 and what they negotiated and provided you 02:19:45
4 under Rule 408. 02:19:48

5 MS. BROWN: I'm sorry. Under a 02:19:49
6 settlement privilege? 02:19:51

7 MR. WINOGRAD: Yes. I said under 02:19:52
8 Rule 408. It's confidential. 02:19:54

9 MS. BROWN: Okay. Can you just 02:19:55
10 explain the legal basis for that on the 02:19:57
11 record? 02:19:58

12 MR. WINOGRAD: Yeah. Those 02:19:58
13 are -- those are confidential 02:19:59
14 settlement communications. 02:20:00

15 MS. BROWN: Under the Federal 02:20:02
16 Rules? 02:20:03

17 MR. WINOGRAD: I've stated my 02:20:05
18 objection, and we can address it later, 02:20:06
19 if you would like. 02:20:09

20 BY MR. WINOGRAD: 02:20:11

21 Q. Does the term sheet contemplate a 02:20:20
22 new funding agreement, to the best of your 02:20:22
23 understanding? 02:20:26

24 MS. BROWN: Hold on. 02:20:26

25 I think you can ask him if it's 02:20:34